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Counsel for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,) Case No.: 2:17-cr-00180-JAD-PAL

- 1) CHANNING WILLIAMS
- 2) EVERLY JAMES
- 3) KORREGAN WASHINGTON
- 4) KEENAN ST. HILLAIRE
- 5) MAURICE LEWIS
- 6) KALEB LOUIS
- 7) CODY WILLIAMS-JACKSON
- 8) TORREN JAMES
- 9) DOMINIQUE WASHINGTON
- 10) DEMANI DANCY
- 11) TREVIONNE WILLIAMS
- 12) CASEY WALTERS JR.
- 13) KEITH BELL
- 14) DENZEL CAMPBELL
- 15) TREVAUGHN JAMES
- 16) DANIEL WILSON.

Defendants

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2 Pursuant to Local Rule 16-1, the United States, by and through the undersigned, and
3 Defendants, by and through undersigned counsel, submit this Proposed Complex Case
4 Schedule as follows:

5 1. Complex Case. The parties stipulate that this is a complex case within the
6 meaning of that term under Title 18, United States Code, Section 3161(h)(7)(B)(ii), in that
7 the nature of the prosecution is such that it is unreasonable to expect adequate trial
8 preparation within the time limits prescribed by the Speedy Trial Act.

9 2. Trial Date. The parties stipulate that they seek to vacate the current trial
10 setting for this matter on August 22, 2017, and set the matter for a firm trial setting in or
11 about May 7, 2018. The United States anticipates it will need no more than two weeks to
12 present its case-in-chief.

13 3. Excluded Time. The parties stipulate that all time from the entry of
14 Defendants' pleas in this case until the trial of this matter is excluded under Title 18, United
15 States Code, Section 3161(h)(7)(A) as the ends of justice outweigh the interests of the
16 public and defendant in a speedy trial.

17 4. Pretrial Motions. The parties stipulate that:
18 A. They shall have to and including January 25, 2018 within which to
19 file any and all pretrial motions and notice of defense;

20 B. They shall have twenty-one (21) days after the filing of a pretrial
21 motion within which to file any and all responsive pleadings;

22 C. They shall have seven (7) days after the filing of a responsive
23 pleading within which to file and all replies to dispositive motions.

24 D. For matters which have been referred to a United States Magistrate

Judge for Findings and Recommendations (F&R), the parties shall have fourteen (14) days from the entry of the F&R to file any objections thereto, and shall have seven (7) days after the filing of any objections to file a response, except as stipulated by the parties and approved by the Court.

5. The Parties' Discovery Obligations

A. The United States shall begin providing its Rule 16 disclosures to the defendant within thirty (30) days of arraignment and, consistent with its ongoing discovery obligations, turn over additional materials as they become available.

B. The defendants' Rule 16 disclosures, including, specifically, disclosures related to expert witness testimony, should be made immediately, or, in all events, no later than on or before seventy-five (75) days before the date set for trial by this Court, in order to allow for sufficient trial preparation.

C. The United States is not required to disclose *Jencks* material until after the government witness testifies on direct examination. 18 U.S.C. § 3500(b). Nonetheless, in the interest of efficiency, the United States will consent to disclose *Jencks* materials no later than twenty-one (21) days before trial, except: (1) with permission of the Court, for good cause shown; and (2) with the caveat that the United States does not consent to any remedy for any violation of the twenty-one (21) day disclosure deadline that would preclude it from calling a witness at trial (that is, it reserves the right to argue to the Court that exclusion of the witness is not a proper remedy).

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1 WHEREFORE, the parties respectfully request that the Court enter a Scheduling
2 Order addressing these issues and such other issues as the Court deems appropriate. All
3 below undersigned counsel agree to this stipulation, except Chris Rasmussen, who
4 represents Maurice Lewis, because he stated on behalf of his client he cannot agree to the
5 proposed trial date.

6 DATED this 27 day of July, 2017.

7 Respectfully Submitted,

For the United States:

8 STEVEN W. MYHRE
9 Acting United States Attorney

10 /s/ Kilby Macfadden
11 CRISTINA D. SILVA
12 KILBY C. MACFADDEN
13 Assistant United States Attorneys

14 For Defendant CHANNING
WILLIAMS (1):

15 /s/ Paul Riddle
16 Paul Riddle
17 Assistant Federal Public Defender

18 For Defendant KEENEN ST.
HILAIRE (4):

19 /s/ Terrence Jackson
20 Terrence Jackson

For Defendant EVERLY JAMES (2):

/s/ Christopher Oram
Christopher Oram

For Defendant MAURICE LEWIS (5):

Chris Rasmussen

1 For Defendant KALEB LOUIS (6): For Defendant Cody Williams-Jackson (7):

2
3 /s/ Maysoun Fletcher
4 Maysoun Fletcher

/s/ Telia Williams
Telia U. Williams

5 For Defendant DOMINIQUE
6 WASHINGTON (9):

For Defendant DEMANI DANCY (10):

7 /s/ David Fischer
8 David Fischer

/s/ Lucas Gaffrey
Lucas Gaffrey

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10 For Defendant Trevionne Williams
11 (11):

For Defendant Casey Walters, Jr. (12):

12 /s/ Michael Miceli
Michael Miceli

/s/ Kathleen Bliss
Kathleen Bliss

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14 For Defendant KEITH BELL (13):

For Defendant Denzel Campbell (14):

15
16 /s/ Jess Marchese
Jess Marchese

/s/ Paola Armeni
Paola Armeni

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19 For Defendant Trevaughn James
20 (15):

For Defendant Daniel Wilson (16):

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22 /s/ Russell Marsh
Russell Marsh

/s/ Lance Maningo
Lance Maningo

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,) Case No.: 2:17-cr-00180-JAD-PAL
Plaintiff,)
vs.)
1) CHANNING WILLIAMS)
2) EVERLY JAMES)
3) KORREGAN WASHINGTON)
4) KEENAN ST. HILLAIRE)
5) MAURICE LEWIS)
6) KALEB LOUIS)
7) CODY WILLIAMS-JACKSON)
8) TORREN JAMES)
9) DOMINIQUE WASHINGTON)
10) DEMANI DANCY)
11) TREVIONNE WILLIAMS)
12) CASEY WALTERS JR.)
13) KEITH BELL)
14) DENZEL CAMPBELL)
15) TREVAUGHN JAMES)
16) DANIEL WILSON,)
)
)
**COMPLEX CASE
SCHEDULING ORDER**

This matter coming before the Court on the parties' Proposed Complex Case Schedule, the premises therein considered, and good cause showing, the Court orders as follows:

1. Complex Case. This is a complex case within the meaning of that term under Title 18, United States Code, Section 3161(h)(7)(B)(ii), in that the nature of the prosecution is such that it is unreasonable to expect adequate trial preparation within the time limits

prescribed by the Speedy Trial Act.

2. Trial Date. The current trial setting for this matter on August 22, 2017 is vacated, and rescheduled to May 8, 2018, at 9:00 a.m.. Calendar Call is set for April 30, 2018, at 1:30 p.m.

3. **Excluded Time.** The parties stipulate that all time from the entry of Defendants' pleas in this case until the trial of this matter is excluded under Title 18, United States Code, Section 3161(h)(7)(A) as the ends of justice outweigh the interests of the public and defendant in a speedy trial.

4. Pretrial Motions. The parties shall have:

A. To and including January 25, 2018, within which to file any and all pretrial motions and notices of defense;

B. To and including twenty-one (21) days after the filing of a pretrial motion within which to file any and all responsive pleadings;

C. To and including seven (7) days after the filing of a responsive pleading within which to file and all replies to dispositive motions.

D. For matters referred to a United States Magistrate Judge for Findings and Recommendations (F&R), the parties shall have fourteen (14) days from the entry of the F&R to file any objections thereto, and shall have seven (7) days after the filing of any objections to file a response, except as stipulated by the parties and approved by the Court.

5. The Parties' Discovery Obligations

A. The United States shall begin providing its Rule 16 disclosures to the defendant within thirty (30) days of arraignment and, consistent with its ongoing discovery obligations, turn over additional materials as they become available.

1 B. The defendants' Rule 16 disclosures, including, specifically,
2 disclosures related to expert witness testimony, should be made immediately, or, in all
3 events, no later than on or before seventy-five (75) days before the date set for trial by this
4 Court, in order to allow for sufficient trial preparation.

5 C. The United States is not required to disclose *Jencks* material until
6 after the government witness testifies on direct examination. 18 U.S.C. § 3500(b).
7 Nonetheless, in the interest of efficiency, the United States will consent to disclose *Jencks*
8 materials no later than twenty-one (21) days before trial, except: (1) with permission of the
9 Court, for good cause shown; and (2) with the caveat that the United States does not consent
10 to any remedy for any violation of the twenty-one (21) day disclosure deadline that would
11 preclude it from calling a witness at trial (that is, it reserves the right to argue to the Court
12 that exclusion of the witness is not a proper remedy).

13 **IT IS SO ORDERED:**

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16 HONORABLE PEGGY A LEEN

August 17, 2017

17 Date
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24 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 A copy of the foregoing **PROPOSED COMPLEX CASE ORDER**
3 **(STIPULATION)** was served on counsel of record by Electronic Case Filing on this 27th
4 day of July 2017.

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8 /s/ *Kilby Macfadden*
9 Kilby Macfadden
10 Assistant United States Attorney

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